



# United Egg Producers

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July 15, 2005

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Executive Director

## Egg Food Safety Center

Dr. Hilary Shallo Thesmar  
Director of Food Safety Programs



Official U.S. Council Representative

## Docket No. 05-015-1

Regulatory Analysis and Development, PPD, APHIS  
Station 3C71

4700 River Road, Unit 118  
Riverdale, Maryland 20737-1238

Dear Sir or Madam:

On behalf of United Egg Producers (UEP), we would like to submit the following comments with respect to the draft strategic plan and draft program standards for the National Animal Identification System (NAIS). UEP is a farmer cooperative whose members account for some 90% of U.S. shell egg production. Our members recognize the necessity for a quick response to outbreaks of animal disease. We are actively participating in the working group on bird identification which the Animal and Plant Health Inspection Service (APHIS) has convened.

UEP would like to make four major points about the NAIS.

First, we support the use of a **flock identification system** for commercial poultry, rather than individual bird identification. The latter would be completely impractical, given the very large numbers of individual birds reared in the layer, broiler and turkey industries. To our knowledge, no one has advocated an individual ID system for commercial poultry, and there seems to be a consensus in favor of flock, group or lot ID.

Second, we believe USDA should investigate whether **individual bird ID may be both feasible and desirable in the live bird markets (LBMs)**. These markets are a reservoir for low-pathogenic avian influenza (LPAI), and the persistence of the virus in these venues raises the concern that it could mutate into a highly pathogenic form. USDA has already undertaken pilot work on individual ID systems for the LBMs, and we encourage the Department to evaluate this and related work, and make a decision that will best protect animal and human health.

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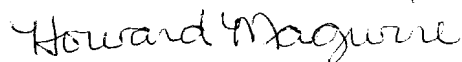
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Third, we encourage USDA to **stress consistency, and avoid duplication**, to the maximum extent possible in implementing animal ID systems. Consistency, for example, suggests the use of the same definitions for "flock" and other relevant terms in the animal ID program that have already been developed for commercial egg layers in the new LPAI surveillance and control system which is being developed by the National Poultry Improvement Plan (NPIP) and will be published as a regulation by APHIS.

Fourth, we join other producer organizations in stressing **the need for information gathered under the NAIS to remain confidential** and exempt from the Freedom of Information Act (FOIA). Since USDA has stated that legislation is necessary to ensure this confidentiality, we urge the Administration to work expeditiously with Congress to pass an appropriate FOIA statutory exemption. Likewise, we urge that NAIS not become mandatory until and unless the FOIA exemption has been achieved.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Howard Magwire".

Howard Magwire  
Director of Government Relations